## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

SCOTT FLORCSK,	)	
	)	
Plaintiff,	)	
	)	
V.	)	C.A. No. 22-1230 (CFC)
	)	
UNSTOPPABLE DOMAINS INC.,	)	
	)	
Defendant.	)	

## STIPULATION AND PROPOSED ORDER TO STAY

WHEREAS, on April 1, 2024, Plaintiff Scott Floresk ("Floresk") filed a Motion for Leave to File a Second Amended Complaint (D.I. 48);

WHEREAS, on April 1, 2024, Defendant Unstoppable Domains Inc. ("Unstoppable") filed a Motion to Dismiss for Lack of Subject Matter Jurisdiction (D.I. 50);

WHEREAS, on April 3, 2024, Unstoppable moved to stay this case pending resolution of its motion to dismiss (D.I. 3);

WHEREAS, on April 24, 2024, Florcsk responded to Unstoppable's motion to stay, indicating that Florcsk does not oppose the requested stay, provided the stay also includes resolution of Florcsk's motion for leave to file a second amended complaint; and

WHEREAS the parties have conferred and agree that a stay of all deadlines in this case pending resolution of the parties' respective motions (D.I. 48 and 50)

will conserve party and judicial resources;

WHEREFOR, IT IS HEREBY STIPULATED AND AGREED by the parties, subject to the approval of the Court, that all deadlines in this matter are stayed pending final resolution by the Court of Plaintiff Scott Florcsk's Motion for Leave to File Second Amended Complaint (D.I. 48) and Unstoppable's Motion to Dismiss (D.I. 50).

IT IS FURTHER STIPULATED AND AGREED that, within 7 days of the Court's resolution of both motions, the parties will confer on a revised case schedule, if necessary, and submit a proposal for the Court's consideration.

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April 30, 2024

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Attorneys for Defendant

IT IS SO ORDERED, this \_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_, 2024.

Chief, United States District Judge